

# EXHIBIT D

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**DOCUMENT REQUESTS**

Please produce the following information in searchable electronic form:

1. The claim information electronically maintained by You in current datafield format for each Mesothelioma Claimant.
2. The amounts paid to each Mesothelioma Claimant by You.
3. The claim status of each Mesothelioma Claimant who filed a claim against You but has received no recovery from You (*i.e.*, whether that claim is still pending or has instead been dismissed).
4. Any listing or database maintained by You regarding sites where Your asbestos-containing products or the asbestos-containing products of other producers, suppliers, distributors, or manufacturers were used.

**TOPICS**

1. The source, creation, maintenance, format and use of the electronic claim and site information described above.

**DEFINITIONS**

1. "Mesothelioma Claimants" shall mean those individuals identified in the enclosed list of claimants.
2. "You" shall mean the recipient of this subpoena, and all of its subsidiaries, affiliates, divisions, and predecessors and their present and former officers, representatives, employees, agents, servants, counsel, investigators, consultants, and all other persons acting on its or their behalf.